

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
WESTERN DIVISION**

SHAUNA HURLES, et al.

Plaintiffs,

vs.

TIFFIN UNIVERSITY,

Defendants.

) Case No. 3:23CV1986

) Judge Jack Zouhary

)

PLAINTIFFS' STATUS REPORT

)

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Now come the plaintiffs, by and through Counsel, and they hereby offer the following status report to the Court, filed separately as the parties could not agree on the terms of a joint report:

1. Consistent with the Court's direction regarding pre-litigation discovery and document exchange, plaintiffs delivered to defendant a detailed request for information on December 13, 2023 requesting eight (8) main categories of information so that plaintiffs could make an informed demand and decision as to claim viability and possible settlement.
2. On January 3, 2024, defendant responded to plaintiffs' request by submitting their initial disclosures which included 123 pages of records relating only to the employment of plaintiffs.
3. Plaintiffs have advised defendant counsel that they believe the initial disclosures did not fully address the request submitted on December 13, 2023, and did not address the spirit and intent of the Court's directions for informal discovery and documents necessary to evaluate the Equal Pay Act claims set forth in the Complaint.
4. On January 16, 2024 plaintiffs submitted their initial disclosures.
5. The parties have reached an impasse. There is clear disagreement about the original directions from the Court. Defendant believes only Initial Disclosures under the Civil Rules were required. Plaintiff heard a very different direction, requiring defendant to deliver documents consistent with the claims set forth in the Complaint.
6. The parties met on January 17, 2024 to discuss the issues and even after that conversation, the parties are moving in different directions.
7. Among the issues not resolved are:
 - a. disclosure of college records under The Family Educational Rights and Privacy Act (FERPA) 20 U.S.C. Section 1232g;

- b. response to complete list of discovery requested and not just the records defendant claims support its termination of the plaintiffs;
 - c. whether the stay should be lifted for discovery and document exchange; and,
 - d. whether motion practice should commence prior to full disclosure of data from defendants relevant to equal pay between.
8. It has become apparent that further directions on discovery, disclosure and the stay of proceedings is necessary.
9. Therefore, plaintiffs request a further Court conference to clarify the Court's prior directions and with that to set a further status report deadline.

Respectfully submitted,

/s/ Joseph F. Albrehta

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CERTIFICATE OF SERVICE

I hereby certify that on January 17, 2024, a copy of the foregoing was filed electronically.
Notice of this filing will be sent to all parties by operation of the Court's electronic filing system.
Parties may access this filing through the Court's system.

/s/ Joseph F. Albrehta
Counsel for Plaintiffs